THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

GINNINE FRIED, on behalf of herself and all others similarly situated,	)	Civil Action No. 15-2512 (MCA)
Plaintiff,	)	
v.	)	**DEFENDANTS' NOTICE OF MOTION FOR PARTIAL SUMMARY JUDGMENT**
JPMORGAN CHASE & CO. and JPMORGAN CHASE BANK, N.A.,	)	**ORAL ARGUMENT REQUESTED**
Defendants.	)	

PLEASE TAKE NOTICE that on May 15, 2017, or as soon thereafter as counsel may be heard, Defendants JPMorgan Chase & Co. and JPMorgan Chase Bank, N.A. (collectively, the "Defendants"), shall move before the Honorable Madeline Cox Arleo, United States District Judge for the District of New Jersey, located at the Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, New Jersey 07101, for an Order granting partial summary judgment to Defendants, dismissing JPMorgan Chase & Co. from this action, and holding that the potential total recovery in this action cannot exceed $500,000.00, pursuant to 12 U.S.C. § 4907(a)(2)(B)(i).

This motion is based on Defendants' Memorandum of Law filed contemporaneously with this Notice, Defendants' Statement of Facts Not In Dispute, the Declaration of Jonathan S. Massey, and such further evidence and argument as the Court may permit. A proposed order is attached.

[Signature Page Follows]

Respectfully submitted,

JPMORGAN CHASE & CO. and
JPMORGAN CHASE BANK, N.A.

By: */s/ Anthony Del Guercio*____

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